



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v. - :

SADDAM MOHAMED RAISHANI, :

a/k/a "Adam Raishani," :

Defendant. :

- - - - - x

INDICTMENT

17 CRIM - 421

COUNT ONE

(Attempted Provision of Material Support and Resources to ISIS)

The Grand Jury charges:

1. From at least in or about January 2017, up to and including in or about June 2017, in the Southern District of New York and elsewhere, SADDAM MOHAMED RAISHANI, a/k/a "Adam Raishani," the defendant, did knowingly and intentionally attempt to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing

JUDGE WOODS

of this Indictment, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B and 2.)

FORFEITURE ALLEGATION

2. As a result of planning and perpetrating a Federal crime of terrorism against the United States, as defined in Title 18, United States Code, Section 2332b(g)(5), as alleged in Count One of this Indictment, SADDAM MOHAMED RAISHANI, a/k/a "Adam Raishani," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offense; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offense; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be

used to commit said offense, including but not limited to a sum of money in United States currency representing the total amount of the defendant's assets.

Substitute Assets Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of SADDAM MOHAMED RAISHANI, a/k/a "Adam Raishani," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code,

Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

Bibi Eslan-Bernandez

FOREPERSON

June 29, 2017

Joon H. Kim

JOON H. KIM

Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

SADDAM MOHAMED RAISHANI,
a/k/a "Adam Raishani,"

Defendant.

INDICTMENT

17 Cr. ____ (____)

(18 U.S.C. §§ 2339B and 2.))

JOON H. KIM

Acting United States Attorney.

A TRUE BILL

Bibi Esla - Berander

Foreperson

June 29, 2017

6-29-17
FT

Filed Indictment.

Case assigned to Judge Woods.

Fox

USMJ